

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

IN RE HAIN CELESTIAL HEAVY  
METALS BABY FOOD LITIGATION

Case No. 2:21-cv-00678-NM-AYS

The Honorable Nina Morrison

**JOINT STIPULATION TO MODIFY DISCOVERY SCHEDULE**

**LABATON KELLER SUCHAROW LLP**

Michael P. Canty  
Carol C. Villegas  
Danielle Izzo  
Michael Hotz  
140 Broadway  
New York, New York 10005  
Telephone: (212) 907-0700  
Facsimile: (212) 818-0477  
mcanty@labaton.com  
cvillegas@labaton.com  
dizzo@labaton.com  
mhotz@labaton.com

*Appointed Interim Counsel for Plaintiffs  
and the Proposed Class*

**JENNER & BLOCK LLP**

Dean N. Panos (*pro hac vice*)  
353 N. Clark Street  
Chicago, Illinois 60654  
Telephone: (312) 923-2765  
Facsimile: (312) 527-0484  
dpanos@jenner.com

*Attorneys for Defendant  
The Hain Celestial Group, Inc.*

WHEREAS:

1. On December 27, 2024, the Court issued an order granting in part and denying in part Defendant The Hain Celestial Group, Inc.'s ("Hain Celestial's") motion to dismiss. ECF No. 213.

2. On January 15, 2025, Plaintiffs and Hain Celestial (the "Parties") jointly stipulated to the entry of a discovery schedule, which contemplated the substantial completion of document discovery by June 20, 2025.

3. The Parties have worked cooperatively to resolve their disagreements over discovery issues, and Hain Celestial has commenced its rolling production of documents. The Parties nonetheless agree that the current deadline of June 20, 2025 for the substantial completion of document discovery is not realistic given the volume of documents left to produce and the parties' outstanding disagreements regarding various discovery issues. The Parties believe that a continuance of the discovery schedule will give Hain Celestial adequate time to complete its rolling production of documents and for the parties to resolve any outstanding discovery disputes.

4. The Parties therefore stipulate to modify the discovery schedule to continue the deadline for the substantial completion of document discovery by approximately nine weeks until August 23, 2025. The Parties have also agreed to continue the remaining deadlines in the discovery schedule by the same period of time, such that fact discovery will close on October 31, 2025 and Plaintiffs' deadline to file a letter requesting leave to file a motion for class certification will be November 21, 2025.

5. This is the Parties' first request for a modification of the discovery schedule, and the requested modification will not affect any other deadlines set by Court order.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the discovery schedule be modified as follows:

Event	Current Deadline	New Deadline
Parties' Substantial Completion of Document Discovery	June 20, 2025	August 23, 2025
Close of Fact Discovery	August 29, 2025	October 31, 2025
Plaintiffs to file letter motion requesting leave to file a motion for class certification	September 19, 2025	November 21, 2025

Date: June 20, 2025

Respectfully submitted,

**LABATON KELLER SUCHAROW LLP**

/s/ Danielle Izzo (with permission)

Michael P. Canty  
Carol C. Villegas  
Danielle Izzo  
Michael Hotz  
140 Broadway  
New York, New York 10005  
Telephone: (212) 907-0700  
Facsimile: (212) 818-0477  
mcanty@labaton.com  
cvillegas@labaton.com  
dizzo@labaton.com  
mhotz@labaton.com

*Appointed Interim Counsel for Plaintiffs and  
the Proposed Class*

**JENNER & BLOCK LLP**

/s/ Dean N. Panos

Dean N. Panos  
Jenner & Block LLP  
353 North Clark Street  
Chicago, Illinois 60654  
Telephone: (312) 923-2765  
Facsimile: (312) 527-0484  
dpanos@jenner.com

Kate T. Spelman  
Alexander M. Smith  
Jenner & Block LLP  
515 South Flower Street, Suite 3300  
Los Angeles, CA 90071  
Telephone: (213) 239-5100  
Facsimile: (213) 239-5199  
kspelman@jenner.com  
asmith@jenner.com

*Counsel for Defendant  
The Hain Celestial Group, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document was filed on June 20, 2025 with the Clerk of the Court by using the CM/ECF system, which will effect electronic service on all parties and attorneys registered to receive notifications via the CM/ECF system.

Dated: June 20, 2025

By: /s/ Dean N. Panos  
Dean N. Panos